**BELLSOUTH**

**BellSouth Corporation**
Suite 900
1133-21st Street, N.W.
Washington, DC 20036-3351

kathleen.levitz@bellsouth.com

**Kathleen B. Levitz**
Vice President-Federal Regulatory

202 463 4113
Fax 202 463 4198

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WRITTEN EX PARTE

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-307 Ex Parte # 2

Dear Ms Dortch:

On November 22, 2002, I met with Christine Newcomb and Laurel Bergold of the Commission's staff. Greg Cooke, Deputy Chief of the Competition Division of the Wireline Competition Bureau participated in the meeting by telephone, as did Ernest Bush, Lisa Foshee, and Bill Stacy representing BellSouth. During the meeting BellSouth representatives addressed issues relating to the operation of the Carrier Service Order Tracking System that BellSouth makes available to its CLEC customers. The attached document summarizes BellSouth's presentation on this subject.

In accordance with Section 1.1206, I am filing this notice and attachment electronically and request that you please place them in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Christine Newcomb
Laurel Bergold
Luin Fitch
Sara Kyle
Greg Cooke
Janice Myles
James Davis-Smith
Beth Keating

## 1. Background.

BellSouth communicates the status of their service orders to CLECs using status codes available to the CLECs through multiple applications and various status reports. The primary system that CLECs should use to determine information about the progress of a BellSouth service order is the same ordering system they used to submit the LSR (LENS, TAG, or EDI). Through these ordering systems, a series of status notices is either automatically sent to the CLEC (EDI and TAG) or retrieved by the CLEC (LENS) as the order progresses from the FOC status to completion. The types of notices returned through the ordering system include the FOC, Jeopardy notices (when applicable), and completion notices.

The Carrier Service Order Tracking System, or CSOTS, is an additional application that CLECs can use to obtain information about the progress of a service order. CSOTS provides service order information drawn from the Service Order Communication System (SOCS) about both electronically submitted and manually submitted LSRs.

## 2. The Normal Sequence of Statuses of a Service Order.

The following describes, in the sequence in which they usually occur, the statuses a service order assumes as it moves toward completion:

1. AO (Assignable Order) - Service order has cleared the SOER (Service Order Edit Routine) edits and is ready to be assigned to a facility.

    1a. PF (Pending Facilities) - If an error is encountered (*i.e.,* a facility is not available).

2. PD (Pending Dispatch) - facilities have been assigned, and the order is ready for the work that needs to be completed on the due date.

    2a. MA (Missed Appointment) - On the due date, either BellSouth or the CLEC was unable to meet their commitment (A sub-code differentiates between BellSouth and the CLEC).

    2b. PF (Pending Facilities) - If an error is encountered (*i.e.,* a facility is not available) or the assigned facility is defective.

3. CP (Completed) - The order has been worked as planned.

4. CA (Cancelled) The order was cancelled by the CLEC sometime during the processing.

A "Routine" order proceeds from Step 1 (AO) to Step 2 (PD) to Step 3 (CP).

### 3. CSOTS – General Information.

While a service order is in Step 2 (PD) or Step 3 (CP), the data on the order are static. BellSouth provides copies of orders in Step 2 or Step 3 in a daily batch download of information to CSOTS.

For orders in the other statuses, *i.e.,* PF, AO, and MA (less than 1% of all CLEC orders are in these statuses on any given day), BellSouth provides each CLEC a copy in the batch download, but also enables the CLEC to obtain an updated, real-time copy of the order via the "UPDATE ORDER" request option in CSOTS. CSOTS, including this "UPDATE ORDER" function, has been available to the CLECs since 1999.

This access is substantially the same as that given to BellSouth's service representatives. Thus, using CSOTS, CLECs can:

- Obtain access to a copy of the service orders for their accounts in all statuses, as of the previous night. This includes all pending and completed orders for up to 6 months.
- Obtain real-time access to SOCS for orders in AO, MA, or PF status. CLECs can track the progress of the small percentage of their orders that are in jeopardy of missing the original due dates.

While it is correct in saying that the copy of the service order is retrieved each night, Network Telephone does have real-time access to orders that are being held in one of the three aforementioned statuses. This is an important fact, since these three status codes can be the primary indicators that an order's provisioning is not proceeding as usual, and that BellSouth has encountered some type of problem in processing the order. The CSOTS Help Guide on BellSouth's Interconnection website on p.15, section 3.2.2.3, Viewing the Service Order, describes how the CLEC can obtain additional information from CSOTS about specific pending LSRs. Receiving these status updates on a real-time basis gives a CLEC like Network Telephone the same ability as BellSouth's service representatives to:

- View key portions of service orders (*e.g.*, the order identification, listing, directory, billing, and service & equipment sections)
- Determine order statuses
- Track other fields like due dates.

An additional report – the line-loss report – tells CLECs when one of their end users changes carriers. This report is available in both web-based and Connect:Direct formats.

### 3. CSOTS performance has not significantly "worsened over the past six months."

In fact, during the first 9 months of 2002, CSOTS was consistently providing a high-percentage and stable availability level – averaging 95.82%, based on outage data posted to the CCP website. In October and November 2002, the CSOTS performance level did decline.

The table below describes the number of CSOTS problems (out of service or degraded service) logged to the CCP Type-1 Outage section of the web reports since January 2002.[1]

| Type | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Totals |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Degraded** | 2 | 2 | 0 | 2 | 3 | 3 | 4 | 1 | 1 | 6 | 8 | 32 |
| **Full** | 3 | 1 | 0 | 0 | 0 | 0 | 1 | 0 | 1 | 1 | 5 | 12 |
| **Total** | 5 | 3 | 0 | 2 | 3 | 3 | 5 | 1 | 2 | 7 | 13 | 44 |

The amount of time for the 12 full outages above (23.08 hours through 11/13/02) represents less than 1% of the total time that CSOTS was available to CLECs during these months.

The root causes of the degradation have already been determined. First, the existing server is no longer able to handle the amount of service order information of the current once-a-day SOCS-to-CSOTS update during the normal daily maintenance window.[2] Frequently, BellSouth is still updating the service order information from the previous business day when CLECs begin to sign on to start the new business day. Second, one CLEC (not Network Telephone) increased its CSOTS query volume by over 500% in October and November, and is responsible for approximately 80% of the CSOTS queries. Since this CLEC is currently in a bankruptcy proceeding, BellSouth cannot limit this CLEC's access to CSOTS without approval of the bankruptcy court. Both of these factors have resulted in slow response times, disconnects and time-outs from CSOTS. Even when CSOTS service is degraded, however CLECs still have the option to call the Local Carrier Service Center (LCSC) for real-time order status information.

### 5. BellSouth has already taken steps to resolve the problems.

BellSouth had already told the CLECs as early as November 7, 2002 via the CCP – and prior to this Network Telephone filing – that BellSouth would install a

[1] A Type 1 system outage is defined as an outage "where the system is totally unusable or there is a degradation in an existing feature or functionality within the interface." CCP Section 3.0.

[2] The BellSouth CSOTS User's Guide specifies that normal hours for CLEC access to CSOTS are 7:00 a.m. to 7:00 p.m., EST on Monday through Saturday (and no availability on Sunday). The other time is considered BellSouth maintenance time, during which BellSouth performs the daily SOCS-to-CSOTS update.

new server to alleviate these service anomalies. Further, BellSouth informed the CLECs on November 15, 2002 that additional information would be forthcoming as part of the 'Infrastructure Changes' standing agenda item at the CCP Monthly Status Meeting on November 20, 2002. At that meeting the CLECs were told that, although the server had been originally scheduled for installation in mid-December 2002, the installation date had been expedited so that the new server will be in operation by the end of November 2002, and that testing of the new server is currently underway.

**6. Plans for a long-term solution are in progress.**

BellSouth had also announced through the CCP that CSOTS would ultimately be moved to a new infrastructure platform as part of the implementation of Release 13.0 currently targeted for June 2003. That movement will be coordinated with the CLECs for testing, and will improve the performance of CSOTS by providing around-the-clock near-real-time access to all CLEC service order information. That information was also provided at the November 20, 2002 CCP meeting, as was an assurance by BellSouth that the new server this month will allow BellSouth to adequately handle the volumes until the infrastructure change is made.

Both of the aforementioned changes are considered infrastructure changes, and are not CLEC-affecting. Accordingly, they are not subject to the change request process within the CCP. Nevertheless, BellSouth has agreed to keep the CLECs informed about the progress of these changes through the CCP, and has honored this agreement, most recently on November 20, 2002.

**7. CSOTS is not the primary tool for receiving completion notices and line loss reports.**

BellSouth is puzzled by Network Telephone's choosing to rely upon CSOTS as that carrier's primary tool for receiving completion notifications and line loss information. As a user of electronic interfaces (LENS and EDI) for over 80% of its requests, Network Telephone would be better served by using those interfaces and the web-based line loss report to gain this information for these LSRs. Other reports – for example, the PON status report, PF report, and the line loss report – provide similar information about order status, including status for manual LSRs. Network Telephone can use these reports for most bulk requests for ongoing status information. As noted earlier, if CSOTS were unavailable when Network Telephone needed real-time LSR status information, the carrier could call the LCSC for this information. The answering time for calls to the LCSC is, on average, less than one minute. LCSC representatives can access SOCS within one minute, so the time to access status information if CSOTS is unavailable is around two minutes.

While other CLECs have verbally requested adoption of a new metric to "track the outages," there is an existing process to request such a measurement. A formal request may be submitted through the Service Quality Measurement (SQM) change control process, and, upon approval by a regulatory commission, BellSouth would develop such a metric. Network Telephone has not chosen to follow the regulatory process and to submit such a request, however.

## CONCLUSION

Each morning CSOTS provides the CLECs with a bulk upload of information about their service orders (all their SOCS orders with PONs and Company Codes) that has been updated during the previous night. In addition, CSOTS gives the CLECs a real-time status for any of their specific service orders in AO, PF, or MA status. This provides CLECs with access to the information in SOCS in substantially the same time and manner as BellSouth retail service representatives for such orders. BellSouth is aware of the recent problems with CSOTS, has been working diligently to resolve the problems, and has been conscientious about sharing with the CLECs information about the status of its efforts. BellSouth's prompt response to the temporary problem with CSOTS demonstrates BellSouth's commitment to providing its wholesale customers access to its OSS on a non-discriminatory basis.